

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 07-CR-30193-JPG
)
TARA PRINCE,)
)
Defendant.)

DEFENDANT'S MOTION TO DISCLOSE GIGLIO MATERIAL

Comes now Defendant, by her attorney, John D. Stobbs II, and for her Motion to Disclose *Giglio* Material states:

1. On November 5, 2008 Defendant filed a Motion For Disclosure of Impeaching Information (Document 73) requesting among other things:

“2. Any and all records and information revealing prior misconduct or bad acts attributed to the witness.”

3. Defendant also requested:

“9. Any and all personal files for the witness; the existence and identity of all federal, state and local government files for the witness; and the existence and identity of all official internal affairs, internal investigation or public integrity investigation files relating to or connected with each witness who was or is a law enforcement officer or agent.”

4. Defendant has reason to believe that an agent involved in the investigation herein and who assisted in procuring a statement from Defendant was punished for not properly following FBI procedures vis-a-vis a bank robbery.

5. This sort of information fits squarely within the parameters of *Giglio v. United States*, 405 U.S. 150, 92 S.Ct. 763, 31 L.Ed. 2d 104 (1972) and its progeny and as such should be disclosed to Defendant.

WHEREFORE, Defendant requests that this Honorable Court grant her Motion and require the Government to disclose any *Giglio* material.

TARA PRINCE

STOBBS LAW OFFICES

BY:

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CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2009 a copy of the attached *Motion to Disclose Giglio Material* was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Mr. Steve Weinhoeft
Assistant U.S. Attorney
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Fairview Heights, Illinois 62208

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